

From: [Morris, Cris@Waterboards](mailto:Morris.Cris@Waterboards)
To: [Medina, Raul@Waterboards](mailto:Medina.Raul@Waterboards)
Cc: [Stuber, Robyn](mailto:Stuber.Robyn)
Subject: RE: Question for the Toxicity Training
Date: Friday, March 13, 2015 10:09:08 AM

Raul, thanks.

Robyn, great to see you yesterday. Could you please add this issue below to the training discussion? We would appreciate it. It is nice to know that not all dischargers are fighting this.

Cris

From: Medina, Raul@Waterboards
Sent: Friday, March 13, 2015 10:01 AM
To: Morris, Cris@Waterboards
Subject: Question for the Toxicity Training

Scenario:

Simi Valley WQCP is now implementing the TST statistical analysis in their chronic toxicity tests. However, the laboratory (ABC Labs) is running 30 replicates in which the TST Tool spreadsheet cannot accommodate all 30 replicates. The TST Tool spreadsheet can only accommodate a maximum of 20 replicates. At this time, in order to input the values of the 30 replicates, the lab will take a paired average (so the 30 replicates will now become 15 replicates, as paired averages). Since our permit has no limit on the number of replicates that they can run, we need to know if the this practice of using a paired average to be inputted as replicate in the TST Tool is acceptable or statistically valid.

Suggested solution:

1. Revise the TST Tool spreadsheet to increase the rows of replicate to 30 (or more).
2. Ask USEPA to give us guidance on this issue so we can tell the permittee to do so.
3. If warranted, we can issue a letter to the permittee, informing them that the maximum number of replicates that they can run is 20.

Just FYI.

Simi Valley WQCP is already reporting chronic toxicity results using TST statistical analysis using Welch's test. So far, they have met the chronic toxicity limitations.

Thanks,
Raul